

1 GEOFFREY A. HANSEN
Acting Federal Public Defender
2 JODI LINKER
Assistant Federal Public Defender
3 19th Floor Federal Building
450 Golden Gate Avenue
4 San Francisco, CA 94102
Telephone: (415) 436-7700
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Counsel for Defendant KRAMER
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)	No. CR-11-0837 RS
)	
12 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE
13)	
14 v.)	
)	
15 ALEXANDER PETER KRAMER,)	
)	
16 Defendant.)	
_____)	

17

18 The parties jointly request that, subject to the Court's approval, the status conference
19 presently set for March 27, 2012 be continued to April 24, 2012 at 2:30 pm.

20 The parties are currently in negotiations over a potential resolution of this matter and
21 believe that additional time is necessary to complete those negotiations. Additionally, defense
22 counsel requires additional time to investigate legal and factual matters that are critical to the
23 case and defense counsel is unavailable during the Court's normal criminal calendar for several
24 weeks due to other work obligations. Accordingly, the parties jointly request that the status
25 conference be continued from March 27, 2012 to April 24, 2012.

26 For the above reasons, the parties stipulate there is good cause – taking into account the

1 public interest in the prompt disposition of this case – to exclude the time from March 27, 2012
2 to April 24, 2012 from computation under the Speedy Trial Act, and that failing to exclude that
3 time would unreasonably deny the defendant and his counsel the reasonable time necessary for
4 effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §
5 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by
6 excluding the time from March 27, 2012 to April 24, 2012 from computation under the Speedy
7 Trial Act and that the need for the exclusion outweighs the best interests of the public and the
8 defendant in a speedy trial.

9 IT IS SO STIPULATED.

10
11 March 19, 2012
12 DATED

/s/
OWEN MARTIKAN
Assistant United States Attorney

13
14 March 19, 2012
15 DATED

/s/
JODI LINKER
Assistant Federal Public Defender

16
17 IT IS SO ORDERED.

18
19 3/20/12
20 DATED


RICHARD SEEBORG
United States District Judge